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April 6, 1998

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BY HAND

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

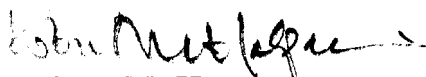
Re: In the Matter of Policies and Rules for the Direct Broadcast Satellite
Service, IB Docket No. 98-21

Dear Ms. Salas:

Transmitted herewith on behalf of the State of Alaska are an original and nine copies of the "Comments of the State of Alaska" in the above-referenced proceeding. Also enclosed is a copy of the pleading on 3.5-inch diskette in WordPerfect 5.1 format.

In the event there are any questions concerning this matter, please communicate with the undersigned.

Very truly yours,


Robert M. Halperin

Enclosures

cc: Christopher J. Murphy
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Before the
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OFFICE OF THE SECRETARY

In the Matter of)
)
Policies and Rules for the Direct) IB Docket No. 98-21
Broadcast Satellite Service)

COMMENTS OF THE STATE OF ALASKA

In a Notice of Proposed Rulemaking released February 26, 1998 (FCC 98-26), the Federal Communications Commission ("FCC" or "Commission") has proposed rules it believes assure that the citizens of Alaska and Hawaii receive direct broadcast satellite ("DBS") service. The State of Alaska ("the State" or "Alaska") appreciates the efforts of the Commission to bring DBS service to Alaska and supports these proposals.

The Commission has proposed to require all DBS licensees granted authorizations after January 19, 1996 to provide service to Alaska and Hawaii where technically feasible. Notice of Proposed Rulemaking ¶ 33. This rule would also apply to licensees who received their authorizations before that date and who request extensions of time or renewal of their authorizations after that date. *Id.*

The Commission has requested comments on whether it should adopt an "off-shore states" policy proposed by the State of Hawaii. That policy would require licensees of DBS channels at eastern orbital positions to demonstrate that they are serving Alaska and Hawaii before they can provide service from any additional eastern DBS channel assignments beyond their existing assignments.

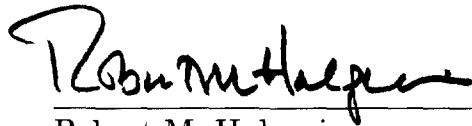
Id. ¶ 34. Alaska supports this policy and believes adoption of this policy is important. This policy would increase the likelihood that DBS service would come to Alaska and Hawaii in a manner comparable to other states without unduly burdening DBS licensees.

The Commission also requested comments on additional steps it should take to ensure delivery of DBS service to Alaska, Hawaii and other off-shore points. *Id.* In that regard, Alaska understands that the comments submitted by the State of Hawaii will present four other steps the Commission should take. Alaska fully supports and endorses Hawaii's proposals in this regard. Specifically, the Commission should (1) expand the scope of geographic service obligations to include foreign DBS providers and geostationary satellite orbit satellites in the Ka-band; (2) clarify that its existing and proposed geographic service rules apply to DBS licensees granted satellite authorizations prior to January 19, 1996 with respect to replacement satellites; (3) continue and clarify the provisions in Section 100.53(a) of its rules to require that DBS operators provide full service to Alaska and Hawaii by the end of their six-year western orbital slot milestones; and (4) clarify that its rules require that the DBS service provided to Alaska and Hawaii

be equivalent in programming as well as power to the service provided to other States.

Respectfully submitted,

THE STATE OF ALASKA

A handwritten signature in dark ink, appearing to read "Robert M. Halperin", written over a horizontal line.

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April 6, 1998

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